

Defendants.

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Civil Action No.:

NOTICE OF REMOVAL

EXHIBIT A

ALABAMA SJIS CASE DETAIL

PREPARED FOR: BERNIE BRANNAN

County: **01** Case Number: **CV-2017-902435.00** Court Action:
 Style: **LOUISE JOE ET AL V. PUBLIX SUPER MARKETS, INC.**

Real Time

Case

Case Information

County: **01-JEFFERSON -** Case Number: **CV-2017-902435.00** Judge: **RSV:ROBERT S. VANCE**
 Style: **LOUISE JOE ET AL V. PUBLIX SUPER MARKETS, INC.**
 Filed: **06/16/2017** Case Status: **ACTIVE** Case Type: **NEGLIGENCE-GENERAL**
 Trial Type: **JURY** Track: Appellate Case: **0**
 No of Plaintiffs: **2** No of Defendants: **1**

Damages

Damage Amt: **0.00** Punitive Damages: **0.00** General Damages: **0.00**
 No Damages: Compensatory Damages: **0.00**
 Pay To: Payment Frequency: Cost Paid By:

Court Action

Court Action Code: Court Action Desc: Court Action Date:
 Num of Trial days: **0** Num of Liens: **0** Judgment For:
 Disposition Date of Appeal: Disposition Judge: : Disposition Type:
 Revised Judgement Date: Minstral: Appeal Date:
 Date Trial Began but No Verdict (TBNV1):
 Date Trial Began but No Verdict (TBNV2):

Comments

Comment 1:
 Comment 2:

Appeal Information

Appeal Date: Appeal Case Number: Appeal Court:
 Appeal Status: Origin Of Appeal:
 Appeal To: Appeal To Desc: LowerCourt Appeal Date:
 Disposition Date Of Appeal: Disposition Type Of Appeal:

Administrative Information

Transfer to Admin Doc Date: Transfer Reason: Transfer Desc:
 Number of Subpoenas: Last Update: **06/16/2017** Updated By: **AJA**

Parties

Party 1 - Plaintiff **INDIVIDUAL - JOE LOUISE**

Party Information

Party: **C001-Plaintiff** Name: **JOE LOUISE** Type: **I-INDIVIDUAL**
 Index: **D PUBLIX SUPER** Alt Name: Hardship: **No** JID: **RSV**
 Address 1: **C/O WHITE ARNOLD & DOWD** Phone: **(205) 323-1888**

Address 2: 2025 3RD AVE N, STE. 500
City: BI State: AL Zip: 35203-0000 Country: US
SSN: XXX-XX-X999 DOB: Sex: F Race:

Court Action

Court Action: Court Action Date:
Amount of Judgement: \$0.00 Court Action For: Exemptions:
Cost Against Party: \$0.00 Other Cost: \$0.00 Date Satisfied:
Comment: Arrest Date:
Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued: Issued Type: Reissue: Reissue Type:
Return: Return Type: Return: Return Type:
Served: Service Type Service On: Served By:
Answer: Answer Type: Notice of No Service: Notice of No Answer:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	GIB024		GIBSON LAURA SHOWS	LGIBSON@WHITEARNOLDDOWD.COM	(205) 323-1888
Attorney 2	WHI001		WHITE JOHN MARK	MWHITE@WHITEARNOLDDOWD.COM	(205) 323-1888

Party 2 - Plaintiff INDIVIDUAL - JOE HENRY

Party Information

Party: C002-Plaintiff Name: JOE HENRY Type: I-INDIVIDUAL
Index: D PUBLIX SUPER Alt Name: Hardship: No JID: RSV
Address 1: C/O WHITE ARNOLD & DOWD Phone: (205) 323-1888
Address 2: 2025 3RD AVE N, STE. 500
City: B State: AL Zip: 35203-0000 Country: US
SSN: XXX-XX-X999 DOB: Sex: M Race:

Court Action

Court Action: Court Action Date:
Amount of Judgement: \$0.00 Court Action For: Exemptions:
Cost Against Party: \$0.00 Other Cost: \$0.00 Date Satisfied:
Comment: Arrest Date:
Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued: Issued Type: Reissue: Reissue Type:
Return: Return Type: Return: Return Type:
Served: Service Type Service On: Served By:
Answer: Answer Type: Notice of No Service: Notice of No Answer:

Attorneys

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Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	GIB024		GIBSON LAURA SHOWS	LGIBSON@WHITEARNOLDDOWD.COM	(205) 323-1888
Attorney 2	WHI001		WHITE JOHN MARK	MWHITE@WHITEARNOLDDOWD.COM	(205) 323-1888

Party 3 - Defendant BUSINESS - PUBLIX SUPER MARKETS, INC.**Party Information**

Party: **D001-Defendant** Name: **PUBLIX SUPER MARKETS, INC.** Type: **B-BUSINESS**
Index: **C JOE LOUISE** Alt Name: Hardship: **No** JID: **RSV**
Address 1: **C/O CORPORATION CREATIONS** Phone: **(205) 000-0000**
Address 2: **6 OFFICE PARK CIRCLE #100**
City: **B** State: **AL** Zip: **35223-0000** Country: **US**
SSN: **XXX-XX-X999** DOB: Sex: Race:

Court Action

Court Action: Court Action Date:
Amount of Judgement: **\$0.00** Court Action For: Exemptions:
Cost Against Party: **\$0.00** Other Cost: **\$0.00** Date Satisfied:
Comment: Arrest Date:
Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued: **06/16/2017** Issued Type: **A-PROCESS SERVER** Reissue: Reissue Type:
Return: Return Type: Return: Return Type:
Served: **06/16/2017** Service Type: **A-AUTHORIZED SERVICE** Service On: Served By:
Answer: Answer Type: Notice of No Service: Notice of No Answer:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	000000		PRO SE		

Financial**Fee Sheet**

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	CONV	C001	000	\$0.00	\$22.04	\$0.00	\$0.00 0	
ACTIVE	N	CVAP	C001	000	\$100.00	\$100.00	\$0.00	\$0.00 0	
ACTIVE	N	CV05	C001	000	\$306.00	\$306.00	\$0.00	\$0.00 0	
ACTIVE	N	JDMD	C001	000	\$100.00	\$100.00	\$0.00	\$0.00 0	
ACTIVE	N	VADM	C001	000	\$45.00	\$45.00	\$0.00	\$0.00 0	
Total:					\$551.00	\$573.04	-\$22.04	\$0.00	

Financial History

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Transaction Date	Description	Disbursement Account	Transaction Batch	Receipt Number	Amount	From Party	To Party	Money Type	Admin Fee	Reason	Attorney	Operator
06/16/2017	CREDIT	CONV	2017182	8852460	\$22.04	C001	000		N			PAS
06/16/2017	RECEIPT	CVAP	2017182	8852470	\$100.00	C001	000		N			PAS
06/16/2017	RECEIPT	CV05	2017182	8852480	\$306.00	C001	000		N			PAS
06/16/2017	RECEIPT	JDMD	2017182	8852490	\$100.00	C001	000		N			PAS
06/16/2017	RECEIPT	VADM	2017182	8852500	\$45.00	C001	000		N			PAS

Case Action Summary							
Date:	Time	Code	Comments				Operator
6/16/2017	8:30 AM	ECOMP	COMPLAINT E-FILED.				GIB024
6/16/2017	8:31 AM	FILE	FILED THIS DATE: 06/16/2017 (AV01)				AJA
6/16/2017	8:31 AM	EORD	E-ORDER FLAG SET TO "Y" (AV01)				AJA
6/16/2017	8:31 AM	ASSJ	ASSIGNED TO JUDGE: ROBERT S. VANCE (AV01)				AJA
6/16/2017	8:31 AM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)				AJA
6/16/2017	8:31 AM	TDMJ	JURY TRIAL REQUESTED (AV01)				AJA
6/16/2017	8:31 AM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)				AJA
6/16/2017	8:31 AM	ORIG	ORIGIN: INITIAL FILING (AV01)				AJA
6/16/2017	8:32 AM	C002	C002 PARTY ADDED: JOE HENRY (AV02)				AJA
6/16/2017	8:32 AM	C002	INDIGENT FLAG SET TO: N (AV02)				AJA
6/16/2017	8:32 AM	C002	LISTED AS ATTORNEY FOR C002: GIBSON LAURA SHOWS				AJA
6/16/2017	8:32 AM	C002	LISTED AS ATTORNEY FOR C002: WHITE JOHN MARK(AV02)				AJA
6/16/2017	8:32 AM	C002	C002 E-ORDER FLAG SET TO "N" (AV02)				AJA
6/16/2017	8:32 AM	D001	D001 PARTY ADDED: PUBLIX SUPER MARKETS, INC.(AV02)				AJA
6/16/2017	8:32 AM	D001	INDIGENT FLAG SET TO: N (AV02)				AJA
6/16/2017	8:32 AM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)				AJA
6/16/2017	8:32 AM	D001	PROCESS SERVE ISSUED: 06/16/2017 TO D001 (AV02)				AJA
6/16/2017	8:32 AM	D001	D001 E-ORDER FLAG SET TO "N" (AV02)				AJA
6/16/2017	8:33 AM	C001	C001 PARTY ADDED: JOE LOUISE (AV02)				AJA
6/16/2017	8:33 AM	C001	INDIGENT FLAG SET TO: N (AV02)				AJA
6/16/2017	8:33 AM	C001	LISTED AS ATTORNEY FOR C001: GIBSON LAURA SHOWS				AJA
6/16/2017	8:33 AM	C001	LISTED AS ATTORNEY FOR C001: WHITE JOHN MARK(AV02)				AJA
6/16/2017	8:33 AM	C001	C001 E-ORDER FLAG SET TO "N" (AV02)				AJA
6/16/2017	11:01 AM	EMISC	RETURN ON SERVICE - SERVED E-FILED				GIB024
6/16/2017	1:31 PM	D001	SERVICE OF AUTHORIZED ON 06/16/2017 FOR D001(AV02)				MAM



END OF THE REPORT



State of Alabama Unified Judicial System Form ARCiv-93 Rev.5/99	COVER SHEET CIRCUIT COURT - CIVIL CASE (Not For Domestic Relations Cases)	Case: 01 Date of Filing: 06/16/2017 Judge Code: 01-CV-2017-902433.00 CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA ANNE-MARIE ADAMS, CLERK
GENERAL INFORMATION		
IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA LOUISE JOE ET AL v. PUBLIX SUPER MARKETS, INC.		
First Plaintiff: <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
First Defendant: <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:		
TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input checked="" type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/ Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
TORTS: PERSONAL INJURY <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property	OTHER CIVIL FILINGS <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Service	
ORIGIN: F <input checked="" type="checkbox"/> INITIAL FILING A <input type="checkbox"/> APPEAL FROM DISTRICT COURT O <input type="checkbox"/> OTHER R <input type="checkbox"/> REMANDED T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
HAS JURY TRIAL BEEN DEMANDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)		
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
ATTORNEY CODE: GIB024 6/16/2017 8:30:01 AM /s/ LAURA S. Chain Date Signature of Attorney/Party filing this form		
MEDIATION REQUESTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		



IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LOUISE JOE, an Individual

HENRY JOE, an Individual

Plaintiffs,

v.

PUBLIX SUPER MARKETS, INC.,

a corporation; "A", being the legal entity or entities owning the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "B", being the legal entity or entities which manage and/or operate the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "C", being the legal entity or entities responsible for the maintenance and supervision of the physical building in which the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "D", being the legal entity or entities which owned the premises where the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama on the occasion made the basis of this lawsuit; and "E", being the legal entity or entities responsible for the actions claimed herein, which led to the injuries referred to in this Complaint, all of whose names and legal descriptions are otherwise unknown to Plaintiff at this time, but will be substituted by amendment when ascertained.

Defendants.

COMPLAINT

FACTUAL BACKGROUND AND JURISDICTION

1. Plaintiff, Louise Joe is over the age of nineteen (19) years and is a resident citizen of Birmingham, Jefferson County, Alabama.
2. Plaintiff, Henry Joe, is over the age of nineteen (19) years and is resident citizen of Birmingham, Jefferson County, Alabama.
3. Defendants Publix Super Markets Inc., is a foreign corporation authorized to conduct business within the State of Alabama, which has its principal place of business in Lakeland, Florida. Further fictitious Defendants are individuals, corporations and/or

business entities owning, operating and/or responsible for cleaning and/or maintaining the premises known as Publix located at 1584 Montgomery Highway, Hoover, Alabama.

4. On or about June 22, 2016, Plaintiff Louise Joe was a customer in Publix Super Markets, Store Number 1207 in Hoover, Jefferson County, Alabama (“the Hoover Publix”) Plaintiff was a business invitee on Defendant’s premises located at 1584 Montgomery, Highway, Hoover, Alabama 35216, which is owned, managed, operated and/or maintained by Defendants.
5. At the same time, Defendant Public Super Markets, Inc., and/or Defendants A, B, C, D and E allowed standing liquid to be present on the floor near the specialty cheese cooler. The Defendant/Defendants failed to notify the public and/or Plaintiff of the hazard present on the floor.
6. As Plaintiff was walking near the specialty cheese cooler in the Hoover Publix, the Defendant and/or Defendants A, B, C, D and E negligently and/or wantonly allowed the freestanding liquid to remain on the floor and thus caused Plaintiff to slip and fall.
7. As a proximate consequence of Defendant’s and/or Defendants’ negligent and wanton conduct, Plaintiff Louise Joe sustained physical injuries and disabilities as set forth below.
8. Plaintiff suffered permanent damages on or about June 22, 2016 as set out further below.
9. Upon proper service of the Summons and Complaint, this Court has jurisdiction of this case and venue is proper pursuant to Alabama Code §6-5-7(a).

COUNT ONE
Negligence and/or Wantonness

10. Plaintiff re-alleges all preceding paragraphs of the Complaint as if fully set forth herein.

11. Plaintiff avers that at the aforesaid time and place, Defendant Hoover Publix and/or Defendants A, B, C, D and E negligently caused or allowed standing liquid to be present on the floor near the specialty cheese cooler in the Hoover Publix. The Defendant and/or Defendants failed to notify the public and/or Plaintiff of the hazard present on the floor. Defendant and/or Defendants had a legal duty and responsibility to maintain Hoover Publix's premises in a reasonably safe condition for its invitees, including the Plaintiff.
12. Plaintiff further avers that at the aforesaid time and place, Defendant and/or Defendants A, B, C, D and E had a legal duty and responsibility to hire, train, advise, and supervise employees regarding the safe condition of the Hoover Publix ' premises in a reasonably safe manner.
13. Plaintiff further avers that Defendant and/or Defendants A, B, C, D and E negligently and/or wantonly breached these legal duties and responsibilities and as a direct or proximate result of the aforesaid negligence and/or wantonness of Defendant and/or Defendants, Plaintiff, Louise Joe, fell and suffered injuries and damages as follows:

She injured her right hip, suffered a cut on her left "big" toe, injured and contused her left knee and injured her left ankle. She was required to have surgery to repair a Labrum tear and undergo a Micro-Fracture procedure and undergo other numerous medical procedures and examinations as well as physical therapy in attempts to treat and heal herself; she was caused to incur hospital bills, doctor bills, physical therapy expenses, pharmacy and other expenses in and about her efforts to treat and heal said injuries; she was caused to take prescription and other medications; she was caused to suffer avoidable and unnecessary physical pain, suffering and discomfort; she was caused to suffer the loss of enjoyment of life; she was caused to suffer temporary and permanent disability; she will be caused to suffer an interference with her ability to perform normal daily activities, including hobbies, all to her detriment; she will be caused to incur medical expenses in and about her efforts to care and treat herself in the future; she has been caused to suffer much mental anxiety, and other mental pain and suffering as a result of her condition and will continue to suffer in the future.

WHEREFORE, Plaintiff, Louise Joe demands judgment against Defendant Publix Super Markets, Inc, and/or Defendants A, B, C, D and E, jointly and severally, for compensatory and punitive damages as allowed under Alabama law, in an amount that is in excess of the jurisdictional requirements of this Court, as well as any and all other legal and/or equitable relief which the Court determines to be appropriate.

COUNT TWO
Loss of Consortium

14. Plaintiff adopts and incorporates all paragraphs of this Complaint as if set out fully herein.

15. Plaintiff, Henry Joe, alleges that the injuries and damages sustained by Louise Joe as a result of the wrongful conduct of Defendant and/or Defendants A, B, C, D and E herein, caused him to lose his wife's consortium – being the right to the love, company, fellowship, cooperation, assistance, society, affections, services and comfort of his spouse, as well as the right to the continuance of the normal marital relationship. Plaintiff further avers that in attempt and efforts to assist in the treatment and healing of his wife's injuries, he has been caused to suffer such mental anxiety and emotional pain and suffering which he will continue to suffer in the future.

WHEREFORE, Plaintiff, Henry Joe, demands judgment against Defendant and/or Defendants A, B, C, D and E, jointly and severally, for compensatory and punitive damages as allowed under Alabama law, in an amount in excess of the jurisdictional requirement of this Court, as well as any and all other legal and/or equitable requirements of this Court, as well as any and all other legal and/or equitable relief which this Court determines to be appropriate.

JURY DEMAND

Plaintiffs hereby demand a trial by a struck jury.

/s/ Laura S. Gibson
LAURA S. GIBSON (GIB024)
J. MARK WHITE (WHI001)

OF COUNSEL:

WHITE ARNOLD & DOWD P.C.

2025 Third Ave. North, Ste. 500

Birmingham, AL 35203

(205) 323-1999 (Telephone)

(205) 323-8907 (Facsimile)

mwhite@whitearnolddowd.com

lgibson@whitearnolddowd.com

PLAINTIFFS:

LOUISE JOE & HENRY JOE

c/o White Arnold & Dowd P.C.

2025 Third Ave. North, Ste. 500

Birmingham, AL 35203

PLEASE SERVE DEFENDANTS BY PERSONAL SERVICE:

PUBLIX SUPER MARKETS, INC.

c/o: CORPORATION CREATIONS NETWORK, INC.

6 Office Park Circle, #100

Mountainbrook, AL 35223

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LOUISE JOE, an Individual)

HENRY JOE, an Individual)

Plaintiffs,)

v.)

PUBLIX SUPERMARKETS, INC.,)

a corporation; "A", being the legal entity or entities owning the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "B", being the legal entity or entities which manage and/or operate the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "C", being the legal entity or entities responsible for the maintenance and supervision of the physical building in which the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "D", being the legal entity or entities which owned the premises where the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama on the occasion made the basis of this lawsuit; and "E", being the legal entity or entities responsible for the actions claimed herein, which led to the injuries referred to in this Complaint, all of whose names and legal descriptions are otherwise unknown to Plaintiff at this time, but will be substituted by amendment when ascertained.

Defendants.

PLAINTIFFS' FIRST INTERROGATORIES

COME NOW the plaintiffs, Louise Joe and Henry Joe, and propound the following interrogatories to the Defendant Publix Supermarkets, Inc., a corporation, to be answered pursuant to the Alabama Rules of Civil Procedure and the definitions contained herein below:

DEFINITIONS

(A) "You" and "Your" means the defendant, Publix Supermarkets, Inc., a corporation, and/or defendants A, B, C, D and E.

(B) The phrase "describe in detail" means state the time, place, persons present and the exact words, or substance of the conversations if you cannot recall the exact words.

(C) The word "person" includes a natural person, corporation, partnership, association of any kind of entity recognized by law, and their employees or independent contractors.

(D) As used herein "documents" refers to all writings, tapes, recordings, graphic representations, drawings or printed materials of any kind whatsoever, however produced or reproduced, that are now or have ever been in your possession or whose existence is or was ever known to you, including but not limited to: correspondence, letters, notes, reports of any kinds, memoranda of telephone conversations, memoranda to file, telegrams, telexes, internal memoranda to file, telegraphs, telexes, internal memoranda, position papers, messages, invoices, bills of lading, contracts, agreements of any kind, shipping or receiving documents, progress reports, accounting records, diagrams, drawings, designs, books or publications, or extracts from any of the foregoing, and any drafts of the above, or any tangible things containing information.

(E) Identify:

(1) As used herein, "identify" when used in reference to an individual person means to state his full name and present address, his present or last known position or business affiliation, his telephone number, and his position and business affiliations at all times during the period covered by these interrogatories.

(2) As used herein, "identify" when used in reference to a document means to state with respect to each document:

(a) The identity of the person who signed it, and in whose name it was issued;

(b) The identity of the person or persons to whom it was addressed;

(c) The nature and substance of the document with sufficient particularity to enable it to be identified;

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Plaintiffs' First Interrogatories

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(d) The date of the document;

(e) The date the document was executed if different from the date it bears; and

(f) If the document or a copy of it that is not in your control or custody, provide the most recent known address of the person who has custody or control of it, or a copy of it.

(F) As used herein, "identify" when used in reference to an event, meeting or discussion means to state the time, date and place thereof, and the circumstances of the occurrence which comprise any event, meeting or discussion identified.

(G) As used herein, the term "describe in detail" means:

(1) Describe fully the reference to underlying facts rather than ultimate facts or conclusions of law or facts.

(2) Particularize as to:

(a) The identity of each person involved in each such event, including, but not limited to persons employed by you, and those persons purporting to act for the plaintiff;

(b) The specific acts of each person participating in each such event;

(c) The date and time of each such event;

(d) The identity of each person present during each such event.

(H) Should you claim "privilege" for any documents about which information is requested by any of the following interrogatories, describe each such document in the above-

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Plaintiffs' First Interrogatories

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referenced matter, and in addition thereto, state what you claim of privilege you make with respect thereto, and the grounds upon which your claim of privilege rests.

INTERROGATORIES

1. Please state the full name, address, job title, and present employer of each person answering and/or assisting in answering these Interrogatories.
2. State the name and address of each person, including experts, having knowledge of relevant facts related to the accident which forms the basis of this cause.
3. State the names, address, and telephone number of any witnesses to the accident which forms the basis of this cause.
4. Please state with specificity what conversations any employee had with the Plaintiff or any other individual who was with the Plaintiff regarding the subject matter made the basis of this action, include in your answer;
 - (a) when the conversation took place;
 - (b) where the conversation occurred
 - (c) what was said
5. Please provide the name and type of insurance which provided you policies of liability insurance at the time of the incident which forms the basis of the plaintiff's Complaint.
6. Describe in detail any act on the part of the plaintiff which you claim contributed to the occurrence of the incident which forms the basis of the plaintiff's complaint

Louise Joe and Henry Joe v. Publix Supermarkets, Inc.

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Plaintiffs' First Interrogatories

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in this action, whether the knowledge is your own personal knowledge or what someone has told you.

7. Describe in detail any statements made by the plaintiff to any of your officers, agents, employees and/or investigators from the day of the incident prior to notice of filing of this action.
8. Identify any person who was present during the time these statements were made by the plaintiff, and give that person's name, address, and telephone number.
9. Please describe in detail how you contend the incident occurred, whether said knowledge is your own personal knowledge or what has been conveyed to you. In your description state the following:
 - (a) Where and when you first saw the plaintiff?
 - (b) How long after you first saw the plaintiff did the incident occur?
 - (c) Do you contend the Plaintiff did anything to contribute to this incident? If so, explain your answer with specificity;
10. Describe in detail your personal theory of any defense or defenses that you personally believe could be used in the defense of this matter.
11. Identify each expert witness that you reasonably expect to call as a witness at trial and for each such expert, state the following:
 - (a) The subject matter on which such expert will testify;

Louise Joe and Henry Joe v. Publix Supermarkets, Inc.

Case No. _____

Plaintiffs' First Interrogatories

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- (b) The substance of the facts to which said expert is expected to testify;
 - (c) The opinions which each expert is expected to express and as to each such opinion, state the summary of the grounds therefor.
- 12. Please identify any and all reports, in any form, submitted to you with regard to the findings and conclusions of each expert. As to each such report, please state:
 - (a) Identity of all persons participating in its preparation;
 - (b) The date of the report;
 - (c) Attach copies of the same to your answers to these interrogatories.
- 13. For each witness you will call or may reasonably intend to call, at the trial of this cause, state:
 - (a) Their name, address, telephone number, employer, and any confidential business relationship which you contend currently exists between you and such witness;
 - (b) A brief summary of their expected testimony; and
 - (c) Identify any and all statements, affidavits, recordings, or writings which each witness is given with respect to this cause.
- 14. Please describe in detail any previous incidents of which the defendant is aware occurred in substantially the same way as plaintiff's accident, in or at the same location.

Louise Joe and Henry Joe v. Publix Supermarkets, Inc.

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Plaintiffs' First Interrogatories

Page 7 of 9

15. Please describe in detail any subsequent incidents of which the defendant is aware, which occurred in substantially the same way as plaintiff's accident, in or at the same location.
16. Did the defendant conduct an investigation of the incident which forms the basis of this cause? If so, please describe same and provide the names and contact information for those who conducted said investigation.
17. When was the last inspection by defendant, its agents or employees, of the physical site where this accident occurred immediately prior to the incident made the basis of this action.
18. Please identify any and all photographs, video, recordings, maps, drawings, charts, diagrams, measurements, surveys, or other documents concerning the events and happenings made the basis of this suit.
19. Please state the name, address, and telephone number of each employee on duty at the time the accident made the basis of this cause occurred.
20. Fully describe the type of floor coverings that were in the area where plaintiff was injured, and state when said flooring was installed and its condition at the time of the accident.
21. Please describe the training procedures, if any, which are followed in the course of training of defendant's employees regarding customer safety and/or customers' slipping and falling. This includes but is not limited to any and all written materials, photographs, films, etc. which defendant utilizes in said training.

Louise Joe and Henry Joe v. Publix Supermarkets, Inc.

Case No. _____

Plaintiffs' First Interrogatories

Page 8 of 9

22. Please identify the entities or persons who maintain the floor area and those responsible for cleaning, repairing, and/or servicing. Please include in your answer all contract information with those persons or entities contracted to maintain and clean the floor area for a twelve month period preceding and including June 22, 2016.
23. Please identify the entities or persons who maintain the floor area and those responsible for cleaning, repairing, and/or servicing. Please include in your answer all contract information with those persons or entities contracted to maintain and clean the floor area for a twelve month period preceding the date of response to these interrogatories.
24. Please state the last date the floor area was cleaned prior to the incident made the basis of this action, and by whom it was cleaned.
25. Please state when the floor area was last repaired prior to the incident made the basis of this claim occurred, and by whom it was repaired.

NOTE: These interrogatories should be deemed continuing in nature, and plaintiffs request that you update your answers and responses to these interrogatories periodically to reflect any information obtained after these interrogatories are initially answered and responded to, so that they may include all information obtained up to and including the trial of this cause.

/s/ Laura S. Gibson
LAURA S. GIBSON (GIB024)
J. MARK WHITE (WHI001)

Attorneys for Plaintiffs

Louise Joe and Henry Joe v. Publix Supermarkets, Inc.

Case No. _____

Plaintiffs' First Interrogatories

Page 9 of 9

OF COUNSEL:

WHITE ARNOLD & DOWD P.C.

2025 Third Avenue North

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Birmingham, AL 35203

(205) 323-1888 (telephone)

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Mwhite@whitearnolddowd.com

Lgibson@whitearnolddowd.com

TO BE SERVED WITH THE SUMMONS AND COMPLAINT



IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LOUISE JOE, an Individual

HENRY JOE, an Individual

Plaintiffs,

v.

PUBLIX SUPER MARKETS, INC.,

a corporation; "A", being the legal entity or entities owning the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "B", being the legal entity or entities which manage and/or operate the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "C", being the legal entity or entities responsible for the maintenance and supervision of the physical building in which the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama; "D", being the legal entity or entities which owned the premises where the business known as Publix located at 1584 Montgomery Highway, Hoover, Alabama on the occasion made the basis of this lawsuit; and "E", being the legal entity or entities responsible for the actions claimed herein, which led to the injuries referred to in this Complaint, all of whose names and legal descriptions are otherwise unknown to Plaintiff at this time, but will be substituted by amendment when ascertained.

Defendants.

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION
UNDER RULE 34 OF THE ALABAMA RULES OF CIVIL PROCEDURE**

Come now the plaintiffs and propound to the defendant, Publix Supermarkets, Inc., the following request for production of documents to be responded to by pursuant to the Alabama Rules of Civil Procedure and pursuant to the definitions contained hereinbelow:

DEFINITIONS

(A) The word "person" includes a natural person, corporation, partnership, association of any kind of entity recognized by law, and their employees or independent contractors.

(B) As used herein "documents" refers to all writings, tapes, recordings, graphic representations, drawings or printed materials of any kind whatsoever, however produced or reproduced, that are now or have ever been in your possession or whose existence is or was ever known to you, including but not limited to: correspondence, letters, notes, reports of any kinds, memoranda of telephone

conversations, memoranda to file, telegrams, telexes, internal memoranda to file, telegraphs, telexes, internal memoranda, position papers, messages, invoices, bills of lading, contracts, agreements of any kind, shipping or receiving documents, progress reports, accounting records, diagrams, drawings, designs, books or publications, or extracts from any of the foregoing, and any drafts of the above, or any tangible things containing information.

REQUEST FOR PRODUCTION

1. Please produce your Certificate of Incorporation and Articles of Incorporation as it relates to the location made the basis of this suit.
2. Please produce the minutes of board meetings since January 1, 2016 through date of response to this request as they relate to the location made the basis of this suit.
3. Please produce any records of any leases entered into by this defendant which were in effect on the date of the incident made the basis of this suit.
4. The policy(ies) of insurance which the defendant hereto, jointly or severally, claims to provide insurance coverage for the defendant, for all or any portion of the complaints made by the plaintiff in the instant action.
5. The architectural plans and/or drawings for the premises in question, specifically with respect to the location where the plaintiff was injured.
6. Please produce the employee list of names and addresses of all cashiers, wait staff, busboys, kitchen staff, maintenance staff, and other employees working all shifts on the 22nd day of June, 2016.
7. Please produce any contracts between the defendant and any maintenance and/or cleaning services in effect at the time of plaintiff's injury.
8. Please produce the list of names and addresses of employees in managerial capacity and documentation of their duties. Said information is requested to include the documentation of their duties beginning the first day of January 2016 through the 30th day of June, 2016.

Louise Joe and Henry Joe v. Publix Supermarkets, Inc.

Case No. CV-_____

Plaintiffs' First Request for Production

Page 3 of 4

9. Please produce any and all company handbooks, policies, and training information, you provide your employees related to daily operating and/or cleaning procedures.
10. Any and all statements, affidavits, recordings, reports photographs or other documents which have been generated by any officer, agent, employee, investigator or other person employed by the defendants hereto concerning the statements of the plaintiff hereto or any witnesses concerning the incident which forms the basis of the plaintiff's complaint in this matter. All information requested is prior to the date of employment of counsel in this matter.
11. The telephone logs, journals, memorandums or other documents which reflect the date, time and/or substance of any conversations between any officer, agent, employee, investigator or other person employed by the defendants hereto and the plaintiff.
12. A copy of any and all reports, in any form, with regard to the findings and conclusions of each expert retained by or on behalf of the defendant hereto to testify at the trial of this matter.
13. Please produce any video recording, security tape, or any other surveillance material which was recorded beginning the open of business on the 22nd day of June, 2016, through the close of business the same day.
14. Please produce a list of any and all witnesses expected to testify, including experts.
15. Copies of reports of all similar accidents, prepared by any and all employees of the premises in question, from two years preceding the date of the accident which forms the basis of this cause.
16. Please produce any and all health inspection reports made of the premises in question, for the two year period immediately preceding the accident which forms the basis of this cause.

17. Any and all inspection reports or other documents relating to observations of store cleanliness by any person or entity, for a period of two years immediately preceding the accident which forms the basis of this cause.
18. Any other documents and/or tangible items which have not been requested which you plan to offer as evidence or use as demonstrative evidence at the trial of this cause.
19. Any photographs, sketches or architectural drawings, reflecting the premises, the number of tables and chairs, and the capacity of said premises from the first day of June 2016, through the current day.
20. A copy of any citations by the Jefferson County Health Department and/or the City, County or State fire marshal, from the first day of January 2016, through the first day of December 2016.

NOTE: These Requests for Production should be deemed continuing in nature, and plaintiffs request that you update your answers and responses to these requests for production periodically to reflect any information obtained after these requests for production are initially answered and responded to, so that they may include all information obtained up to and including the trial of this cause.

/s/ Laura S. Gibson

LAURA S. GIBSON (GIB024)

J. MARK WHITE (WHI001)

Attorneys for Plaintiffs

OF COUNSEL:

WHITE ARNOLD & DOWD P.C.

2025 Third Avenue North
Suite 500, The Massey Building
Birmingham, AL 35203
(205) 323-1888

Mwhite@whitearnolddowd.com

Lgibson@whitearnolddowd.com

TO BE SERVED WITH THE SUMMONS AND COMPLAINT



AlaFile E-Notice

01-CV-2017-902435.00

To: LAURA S. Chain
lgibson@whitearnolddowd.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LOUISE JOE ET AL V. PUBLIX SUPER MARKETS, INC.
01-CV-2017-902435.00

The following complaint was FILED on 6/16/2017 8:30:34 AM

Notice Date: 6/16/2017 8:30:34 AM

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203

205-325-5355
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2017-902435.00

To: PUBLIX SUPER MARKETS, INC.
C/O CORPORATION CREATIONS
6 OFFICE PARK CIRCLE #100
B, AL, 35223

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LOUISE JOE ET AL V. PUBLIX SUPER MARKETS, INC.
01-CV-2017-902435.00

The following complaint was FILED on 6/16/2017 8:30:34 AM

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BIRMINGHAM, AL, 35203

205-325-5355
anne-marie.adams@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 01-CV-2017-902435.00
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA
LOUISE JOE ET AL V. PUBLIX SUPER MARKETS, INC.

NOTICE TO: PUBLIX SUPER MARKETS, INC., C/O CORPORATION CREATIONS 6 OFFICE PARK CIRCLE #100, B, AL 35223

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 LAURA S. Chain

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: 2025 3rd Avenue North, Suite 600, BIRMINGHAM, AL 35203

[Address(es) of Plaintiff(s) or Attorney(s)]

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____

[Name(s)]

6/16/2017 8:30:34 AM /s/ ANNE-MARIE ADAMS By: _____

(Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____

(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____

_____ in _____ County,

(Name of Person Served) *(Name of County)*

Alabama on _____

(Date)

(Type of Process Server)

(Server's Signature)

(Address of Server)

(Server's Printed Name)

(Phone Number of Server)

ELECTRONICALLY FILED

6/16/2017 11:01 AM

01-CV-2017-902435.00

CIRCUIT COURT OF

JEFFERSON COUNTY, ALABAMA

ANNE-MARIE ADAMS, CLERK



State of Alabama
Judicial System
C-34 Rev. 4/2017

SUMMONS - CIVIL -

Court Case Number
01-CV-2017-902435.00

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA
LOUISE JOE ET AL V. PUBLIX SUPER MARKETS, INC.

NOTICE TO: PUBLIX SUPER MARKETS, INC., C/O CORPORATION CREATIONS 6 OFFICE PARK CIRCLE #100, B, AL 35223

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), LAURA S. Chain

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: 2025 3rd Avenue North, Suite 600, BIRMINGHAM, AL 35203

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____ pursuant to the Alabama Rules of the Civil Procedure.

(Name(s))

6/16/2017 8:30:34 AM

(Date)

/s/ ANNE-MARIE ADAMS

(Signature of Clerk)

By:

(Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____ (Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____

JULIE BUCKNER - Reg. Agent in _____ County,

(Name of Person Served)

(Name of County)

Alabama on

6-16-17

(Date)

LAW FIRM PROCESS

(Type of Process Server)

SERUM

(Server's Signature)

W. WAGGONER
(Server's Printed Name)

Process Server

White Arnold & Dowd P.C.

(Address of Server)

ATTORNEYS AT LAW

2025 Third Avenue North

Suite 500

Birmingham, AL 35203

(Phone Number of Server)

01-CV-2017-902435.00

LOUISE JOE ET AL V. PUBLIX SUPER MARKETS, INC.

C001 - LOUISE JOE

(Plaintiff)

v.

D001 - PUBLIX SUPER MARKETS, INC.

(Defendant)



SERVICE RETURN COPY

DOCUMENT 7



AlaFile E-Notice

01-CV-2017-902435.00

To: LAURA S. Gibson
lgibson@whitearnolddowd.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LOUISE JOE ET AL V. PUBLIX SUPER MARKETS, INC.
01-CV-2017-902435.00

The following RETURN ON SERVICE - SERVED was FILED on 6/16/2017 11:02:27
AM

Notice Date: 6/16/2017 11:02:27 AM

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL, 35203

205-325-5355
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2017-902435.00

To: PUBLIX SUPER MARKETS, INC. (PRO SE)
C/O CORPORATION CREATIONS
6 OFFICE PARK CIRCLE #100
B, AL, 35223-0000

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BIRMINGHAM, AL, 35203

205-325-5355
anne-marie.adams@alacourt.gov



AlaFile E-Notice

01-CV-2017-902435.00

To: WHITE JOHN MARK
mwhite@whitearnolddowd.com

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